

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS  
DOCKET NO.: 04CV-10357RCL

SHELDON G. ADELSON,  
Plaintiff,

v.

MOSHE HANANEL,  
Defendant.

**PLAINTIFF, SHELDON G. ADELSON'S, MOTION FOR LEAVE  
TO FILE A REBUTTAL BRIEF IN OPPOSITION TO THE DEFENDANT'S MOTION  
TO DISMISS FOR FORUM NON-CONVENIENS**

The Defendant, Moshe Hananel ("Hananel"), has filed a motion for leave to file a reply brief. As of the date of this motion, the Court has not acted upon the Defendant's motion.

The Plaintiff, Sheldon G. Adelson ("Adelson"), therefore respectfully moves that if this Honorable Court grants the Defendant's motion to file a reply brief that it grants the Plaintiff leave to file a rebuttal brief.

The grounds for this motion are that the Defendant's reply brief not only misconstrues important precedents, and misstates facts but in dealing with his claim that he is too ill and disabled to participate conveniently in a trial in this district, he has made statements that are clearly false and can be demonstrated to be so by the rebuttal brief and its supporting materials the Plaintiff wishes to file. The materials include additional videos of Hananel performing activities in direct contradiction to the assertions made in his reply brief.

The Plaintiff,  
SHELDON G. ADELSON,  
By his attorneys,

/s/ Albert P. Zabin

Franklin H. Levy, B.B.O. No.: 297720

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Dated: January 25, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 25, 2006.

/s/ Albert P. Zabin  
Albert P. Zabin